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This report was commissioned for English Heritage as part of the implementation of Heritage Protection Reform to provide an assessment of the relevance of the 'legacy' designation programmes to future designation activity. It should therefore be read as a background document to the preparation of the National Heritage Protection Plan, but not as an indication of English Heritage's future designation priorities which will be determined by the Plan.

**HERITAGE PROTECTION REFORM
IMPLEMENTATION –
STRATEGIC DESIGNATION
REVIEW OF PAST AND PRESENT THEMATIC
PROGRAMMES**

**Martin Cherry and Gill Chitty
February 2009
(Revised version October 2009)**

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1. ACKNOWLEDGEMENTS

We are grateful to English Heritage staff for their extensive knowledge, wise experience and (occasionally strong) views on past and present designation programmes:

Tony Calladine, Wayne Cocroft, Graham Fairclough, Keith Falkner, Emily Gee, Colum Giles, Jill Guthrie, Elaine Harwood, Bob Hawkins, Julian Holder, Sophie Houlton, Jeremy Lake, Richard Morrice, Kathryn Morrison, Peter Murphy, Martin Newman, Adrian Olivier, Henry Owen-John, Deborah Porter, John Schofield, Chris Scull, Pete Smith, Paul Stamper, Robin Steward, David Stocker, Dave Went.

Roger Bowdler and Peter Beacham have been supportive throughout and provided clear guidance as to the political drivers behind current changes and the nature of the challenges that lie ahead.

In particular we would like to thank Lucy Oldnall in HPD who provided much-needed support and co-ordination for the project, and David Hilton in the National Monuments Record who supplied us with essential data about listings and schedulings and showed endless patience with our many requests.

Klara Spandl, Oxford Archaeology, Frank Green, New Forest National Park, and Margaret Nieke, Natural England, provided valuable background information. Thanks to Geoff Brandwood for his observations on the pubs TLR project.

2. PROJECT BRIEF OUTLINE ¹

2.1 From the late 1980s the former Listing Team, Parks and Gardens Team and Monument Protection Programme carried out a series of thematic projects and reviews into a wide range of asset types prior to their merger to form the Heritage Protection Department (HPD) in 2002.

2.2 The reports generated by these projects make recommendations about an asset's suitability for designation and provide to varying extent research into the asset type and its place in the national context. These thematic projects largely came to a halt following the creation of HPD as resources were channelled into HPR and reactive designation requests. Therefore many of these recommendations have not been acted upon and policy decisions regarding these asset types have yet to be made

2.3 The process ground to a halt principally because the current designation regimes were increasingly unsuitable for the comprehensive statutory protection and management of the wide range of historic assets now in scope. The artificial distinctions between 'archaeology', 'buildings', 'architecture' and 'landscape' were especially problematic when dealing with such issues as commercial, industrial or military heritage or when trying to deal with obvious historic entities like the classic country house, its designed landscape and its archaeological features and context.

¹ English Heritage Project Brief, version 5, 18 August 2008

2.4 The long-gestated Heritage Protection Reform process, which is concerned with modernising the statutory system of heritage designation and management, had at the time of writing this report reached the stage of draft legislation (though it is now uncertain when parliamentary time will be available for its passage or whether the new government that will emerge in 2010 will have either the time or inclination to take a new bill forward). The key component of reform is a unified designation regime and the new national register to which all existing national designations will be migrated and new designations added. To make this fit for purpose, English Heritage needs to ensure that it fully takes stock of the inherited designation programmes. It therefore needs a radical retrospective audit of where it is, and an equally radical prospective approach to the priorities for future designation.

2.5 The overall aims of this project are

- To assess the state of understanding of the particular asset type in each of the identified thematic projects and to determine whether or not the conclusions are still relevant and useful.
- To identify asset specific recommendations that could be followed up based on the original project analysis
- To develop policy guidance on the outcome of these inherited programmes to inform priorities for English Heritage's new national strategic designation programme which are in-line with the unified designation approach of the proposed new system.

2.6 The project tasks include

- An overview of the quality and utility of each of the thematic projects to determine its fitness for purpose against the objectives of HPR (reviewed against agreed criteria)²
- Determining whether or not the reports make a comprehensive sweep across the whole resource or were based on the sampling of best examples (including a short summary of each project setting out its aims and objectives and whether or not these were met, identifying omissions in knowledge and where our understanding of a particular asset type has moved on)
- Identifying on what basis the designation recommendations in each report were made and providing an assessment of whether or not they should still stand based on an HPR approach (including a spreadsheet setting out the options for recommendations made in the thematic project and indicating a suggested way forward)
- General policy guidance for English Heritage on designation priorities derived from the conclusions of the review of inherited programmes and the implications of the new designation system as proposed in the draft Heritage Protection Bill (making recommendations on a way forward which is strategic and pro-active)

• ² A number of projects were specifically excluded from the brief.

3 EXECUTIVE SUMMARY

3.1 Background and scope

This report analyses the bulk of the thematic heritage asset assessment programmes carried out by or for English Heritage under the Monuments Protection Programme (MPP), the Thematic Listing Review (TLR) and the Parks and Gardens Register Programme before their suspension in 2004. The main driver for the work was English Heritage's need to know which (or which parts) of these 'legacy programmes' remained relevant to the needs of Heritage Protection Reform (HPR). The project brief is in the preceding section. The work was carried out over the winter months of 2008-08 and submitted on 25 April 2009.

The report acknowledges the cumulative significance of these legacy programmes to the current state of knowledge, to the protection of key elements of the historic environment, and to developing ideas about good management practice. The following programmes (see table below) were audited and an attempt was made to evaluate their current relevance for HPR in terms of policy context, conservation priority, and level of risk. (A small number of programmes were specifically excluded from the project brief.) The 'current relevance' assessment should be treated with caution and readers with an interest in a particular programme should turn to Appendix 1 and to the spreadsheet summary since relevance takes many forms and does not necessarily reflect the intrinsic quality of the work done. High relevance may reflect the existence of high-quality data on a threatened asset that has not yet been processed, or where recommendations have not been implemented, or projects that developed valuable assessment methodologies that might be transferable to other programmes. It may equally reflect the importance of *process* in providing successful management or collaborative models, even in cases where the projects have been successfully completed. Medium relevance might be accorded to projects that, even though incomplete, relate to an asset that is not under critical threat or are of lesser priority for English Heritage or the sector. Low relevance might indicate a project that has been substantially completed, as well as one that did not satisfactorily achieve its objectives. 'High' and 'low' should not automatically be equated with 'good' and 'bad'.

Summary of assessed projects

THEMATIC PROJECT	CURRENT RELEVANCE
Communications 1. Railways	High
Military 2. Defence infrastructure (a) Royal Naval Dockyards (b) Ordnance yards (c) Barracks (d) Drill halls	High (archaeology) Low (buildings) Low Low High
3. Post-war listing programme	High

Metropolitan 4. Civil Aviation 5. Cinemas 6. London flats 7. Letterboxes 8. Historic Environment in Liverpool Project (HELP) 9. Pre-war public libraries in London 10. Schools (a) London (b) Birmingham, Leeds, Manchester, Sheffield 11. Pubs	Medium Medium Medium High High High High High Low High
Agricultural 12. Farmsteads (a) Regional studies (Norfolk, Suffolk, Cumbria, Devon) (b) Model farmsteads	High
Churches and chapels 13. Manchester churches 14. Cornish chapels	Low High
Industries 15. Textiles (a) Manchester cotton (b) West Yorkshire woollens (c) Cheshire silk (d) East Midlands lace and hosiery (e) West Country woollens (f) Derwent Valley 16. Furniture manufacturing in Shoreditch 17. Birmingham Jewellery Quarter 18. Other intensive industrial area assessments (a) Sheffield metalworking (b) Liverpool and Manchester warehouses (c) Northamptonshire boots and shoes 19. Engineering works (SHIERS) 20. Nuclear Power (SHIERS) 21. Maltings, hop kilns, oasthouses, breweries (TLR/SHIERS)	Low High High High High Medium Medium High High High High Low High High
MPP: C20th military heritage 22. Anti-Aircraft Gunsites 1914-1955(+ Operation Diver) 23. Anti-Invasion Defences of World War II 24. Bombing Decoys of World War II 25. D-Day Embarkation sites (Operation Overlord) 26. Coast Artillery 1900-1956 27. Civil Defence in World War II 28. World War II Airfield defences 29. World War II Radar Stations	Medium High Medium Medium Medium Low/Medium Medium Low/Medium

30. Cold War	High
MPP: industrial heritage Extractive 31. Lead industry 32. Coal industry 33. Alum industry 34. Tin, copper and non-ferrous metal industries 35. Iron mining and iron and steel production 36. Stone quarrying 37. Salt industry 38. Clay industries 39. Underground extraction features	Low Low Low Medium/High Medium/High Low /Medium Low /Medium Medium/High Low /Medium
Manufacturing 40. Gunpowder 41. Brass 42. Glass 43. Lime and cement 44. Chemicals	Low Low Medium Medium Low/Medium
Agricultural processing 45. Dove Farming 46. Ice houses	Low Low
Power and Utilities 47. Electricity industry 48. Water and sewage industry 49. Gas industry 50. Oil industry	Medium High High High
Transport 51. Bridges	High
Other MPP thematics Settlement and Field Patterns of England Later prehistoric and Roman Settlement Ecclesiastical Rapid Coastal Zone Assessment Surveys	High High Medium High
MPP: Area-based studies 52. New Forest 53. Non-Tidal River Thames Rock Art	Medium High Low
Registers 54. Parks and Gardens and Battlefields Registers	High

3.2 Structure of the report: an aid to navigation

This report with its appendix and summary is a long document but it is set out with a view to providing easy access for those searching for specific projects. The main

report is the only section that ideally should be read by all; the appendix and summary cover *specific* projects and recommendations and will be read in their entirety only by those who need to acquire a detailed overview and designation anoraks.

(i) The **main report** (*Review of past and present thematic programmes*) provides an historic overview of the development and objectives of the MPP (section 4.1 – 4.6) and TLR (4.7) and then raises a number of related issues (section 5). Although the project brief assumed that the report would focus on levels of coverage, completeness, methodology and accessibility, for each of the projects, it became apparent that process (management structures, handling of public consultation, institutional organisation etc) was often of equal relevance to HPR. This is discussed in the main report but detailed in the appendix for each individual project, and summarized in the options spreadsheet.

(ii) In order not to drown the main report with detail, all the individual projects (listed in the above table) are discussed in depth in **Appendix 1** (*Summaries of past thematic projects*). All of these entries follow a consistent format: a *retrospective review* covering (a) the date and authorship of the assessment; (b) definition of the subject; (c) coverage (national, regional, cross-period); (d) an evaluation of the authoritativeness of the project findings; (e) the soundness of the recommendations; (f) clarity and accessibility of the material; (g) the extent to which recommendations were implemented and the sustainability of the recommendations; followed by (h) *an assessment of the relevance* of the project; and (i) *recommendations as to whether or how best to take the work forward*. **This appendix forms the factual core of the report but users requiring a quick path to the current state of play of each project and its value to HPR should refer to the options spreadsheet.**

(iii) The **spreadsheet** that comprises the third element of this report (*Options for designation –recommendations*) provides fast track access to the specific findings of this report. The first cluster of columns indicates the extent to which:

- (a) The designation programme based on thematic study appears to be satisfactorily completed;
- (b) There is a designation deficit: incomplete coverage and / or recommended protection including designations not implemented;
- (c) Research and / or operational value was not fully realised through dissemination or publication;
- (d) Documentation is widely accessible (records online through NMR or web-based resource, published synopsis, popular booklet, guidance);
- (e) That opportunities exist for an HPA / management agreement approach / agri-environment targeting;
- (f) That the programme is suited to area assessment, character analysis or landscape-scale approach
- (g) That there is a need for a review of listing and scheduling policy to clarify an integrated approach for designation.

A free-text column to the right summarises the current position and the potential of the project concerned for HPR purposes. **Readers pressed for time should turn first to the final column of the spreadsheet relating to the project(s) that interest them, and then refer to Appendix 1 for more detail, background and fuller justification of the options and recommendations.**

3.3 Key findings and recommendations

The overview of legacy projects (section 4) sets out the scope and achievement of the MPP and the TLR and their wider outcomes. The product of past thematic projects was more than simply the sum of their designations (in some cases none ever resulted) and influenced the direction of travel towards a unified designation system and a targeted, research-led approach to conservation management. All legacy projects to a great or lesser extent contributed to this and lessons from them have been brought together in the recommendations and guidance.

Suggested options for taking forward legacy projects in the future (detailed in Appendix 1 and summarised in the spreadsheet) were based on a consideration of whether:

- ❑ The thematic study was concluded as intended to protect the asset group in question
- ❑ The research report of the project is archived, appropriately accessible for EH, professional and public benefit
- ❑ The project is suited to an HPR approach to conservation, which includes designation alongside other frameworks for protection and managing change.

This report was compiled at the same time as a paper was being prepared (and circulated internally on a need to know basis) for EH commissioners that identified a number of broad thematic areas for priority treatment. This was to form the basis of a public consultation exercise on the future direction of thematic programmes. This report does not seek to modify the priorities identified in that paper, but does focus on the strengths and shortcomings of the legacy programmes in order to provide guidance as to how the results and approaches of these priority programmes can help achieve HPR strategic objectives (section 5). The detailed recommendations (in the options spreadsheet) cross-refer to the thematic areas identified and provide empirical support for many of the proposed priorities. Some asset types, however, fall outside these.

Except for some special cases, our view is that national-scale designation surveys will rarely be justified now (4.3.5, 5.2.8 – 5.2.10). Models proposed for future HPR programmes include intensive area assessments (5.3 A) and approaches based on benchmarking (5.3 B), on management agreements (5.3 C) and character area assessment (5.3.D). For larger-scale thematic designation surveys, regional and sub-regional approaches that are responsive to local historic character, environmental and socio-economic factors will provide a more relevant framework and may also connect with regional research priorities. New heritage protection programmes will take place within a much more finely tuned framework of regional policies, spatial planning and research strategies, within which LDFs and local authority heritage strategies are nested.

Important success factors identified in this report (and detailed at many points in the appendix) include the following key elements:

- ❑ partnership with stakeholders;
- ❑ integrated teams and project management;
- ❑ targeted research bespoke to conservation management needs;

- ❑ appropriate documentation and dissemination planning;
- ❑ the building-in of relevant conservation planning elements from the outset;
- ❑ and other related assessments where appropriate (socio-economic, environmental, landscape).

The HPR opportunity is to create an outward facing, consultative strategic programme, founded on partnership working. It will require effective project management and cross-departmental programming for communication, implementation and publication from the outset.³

Designation will play a critical role but only one among many in an approach that will:

- Require teamwork and a mutual understanding of objectives and individuals/teams role in meeting them.
- Provide opportunities for training, both in-house/cross departmental and on-the-job training with other bodies such as LPAs.
- Fulfil and promote EH's conservation principles regarding:
 - Promoting the historic environment as a shared resource;
 - Encouraging participation, both professional and for the wider public;
 - Bringing specialist and non-specialist views of significance centre stage;
 - Seeking out sustainable solutions at the earliest stage in the process;
 - Creating a platform for transparent and consistent decision making;
 - Providing adequate documentation to enhance understanding and provide lessons for future initiatives.

³ The introduction of the MORPHE framework for management of English Heritage research projects has addressed many of the issues identified in the report about best practice in archiving, dissemination and project management.

4. THE LEGACY: AN OVERVIEW

4.1 MONUMENTS PROTECTION PROGRAMME (MPP) 1986 – 2004

4.1.1. Background

The Monuments Protection Programme (MPP) was initiated by English Heritage in 1986 to accelerate progress with protection and statutory designation for nationally important monuments. A rapid assessment in 1984 had shown that only 2% of archaeological sites were protected and that this sample was wholly unrepresentative (HBMCE 1984). Between 1986 and 2004 MPP developed and implemented a systematic approach for classifying, evaluating and selecting sites for protection by scheduling and through other forms of management. *MPP 2000: A review of the Monuments Protection Programme, 1986 - 2000* (Schofield 2000) provides a comprehensive summary on which this introduction has been based.

4.1.2 SMR-based evaluations, carried out between 1989-92, used existing records and current knowledge in local archaeological services to gain a national overview. A scoring system based on the non-statutory criteria for scheduling was used to support professional judgement on national importance for each monument class. This was an effective approach for the better recorded classes of monument and for well-understood, established fields of archaeological enquiry. However, existing SMR data did not provide the national coverage and consistency required for MPP evaluation for some classes of site and periods. Special programmes of evaluation were devised nationally to address industrial archaeology and recent military heritage and to provide frameworks for managing the protection of landscape-scale character such historic settlement and agricultural systems. These are described in detail below.

4.1.3 Policy, as set out in ‘Scheduling and post-PPG16 Planning’ in 1996 defined the task of the MPP evaluation process as ‘to identify cases of clear national importance suited for statutory protection and to distinguish from them cases where

- (a) a site is of national importance but scheduling is not appropriate, or
 - (b) national importance cannot currently be demonstrated satisfactorily,
 - or
 - (c) less than national importance must be ascribed to the case’
- (Fairclough 1996).

4.1.4 Post PPG 16 (1990), the planning system provided ‘a framework for the management of monuments where continuing or adaptive re-use is the preferred option, where a programme of research and recording is an acceptable alternative to long term preservation, and in the context of historic urban centres [where other management policies operate]’ (Fairclough 1996). Increasingly since then alternative frameworks have been employed for managing change and protecting the special interest of archaeology, historic buildings and urban and rural landscape, for example using other forms of designation, historic landscape and townscape characterization and historic area analysis.

4.1.5 In the new HPR environment some aspects of scheduling selection policy articulated for MPP will require rethinking, particularly given the intention to devolve responsibility for former scheduled monuments to local authorities and essentially to place their management within the planning system. English Heritage policy in 1996, as

used to guide selection in the MPP programme, set out the justification for managing nationally important archaeology outside the planning system:

Under the current PPG16 planning regime, scheduling will not be used simply to denote or reward national importance. It will be reserved for those cases where protection is required beyond that achievable through the planning process, where the management objective is preservation with minimal change and where a national context for decision-making is considered necessary. It will also be used to identify those monuments for which archaeological considerations are deemed to take priority over other land-use issues.

The scheduled monument consent process, with its presumption in favour of unchanged preservation, can, if necessary, place the needs of long term archaeological conservation ahead of the other considerations which planning authorities, given their own priorities and duties, are bound to take into account. Scheduling may, therefore, be used to denote the requirement for a national, as well as a local, context for decision making and actively to direct damaging development away from monuments of national importance (Fairclough, 1996).

4.1.6 A policy position on listing and scheduling was drafted in 1997 with the intention of publication, though this remained a draft (Stocker 1997). Essentially it set out a formal distinction between protection for nationally important heritage assets outside the planning system (through scheduling) where unchanged preservation was the primary intention, and management of change to heritage assets through the planning system (listing and PPGs) to ensure appropriate adaptation and continued use.

4.2. MPP industrial heritage programme – Background

4.2.1 In the initial rapid assessment of archaeological resources (HBMCE, 1984), existing research and records for industrial archaeology were found to vary widely in depth and consistency, while the high numbers of surviving sites posed a further challenge for understanding and evaluation. ‘The MPP returned to first principles and adopted an approach aimed at creating an ordered sequence of data-gathering, synthesis and peer-aided judgement’ (Schofield 2000, 6):

A staged approach for evaluation and selection of industrial monuments for statutory protection proceeded through a series of ‘steps’ and included targeted and general consultation in the sector with SMRs, specialist groups and experts at several stages (AMAC 1992, Stocker 1995, Cranstone 1995). The industrial programme was based on Arthur Raistrick’s classification of industry by material and process as the structure for systematic evaluation by type of industry:

- Extractive industries
- Inorganic manufacturing
- Agricultural (organic) processing and manufacture
- Power and Utilities
- Transport and Communications

4.2.2 Step 1 of this thematic approach characterised each industry: the main stages of its historical and technological development, terminology, chronology, regional diversity, distinctive component structures and features, existing specialist records and expertise / study groups. This initial draft report then went out to consultation in the sector.

4.2.3 Step 2 consolidated the results of consultation, reviewed the Step 1 outline and compiled a shortlist of sites of potential interest.

4.2.4 Step 3 was the main field assessment and evaluation stage, based on the Step 2 shortlist, providing a site-by-site national evaluation and overview of the quality and scale of the industry's preservation. Every site evaluated was visited in the field though full access was not always possible. These surveys do not provide a definitive inventory of sites for each industry and indeed it was rarely possible to draw on a comprehensive survey of the historical resource for any industry. The process used the best available information sources, and local and specialist knowledge, but the quality of coverage inevitably varied from area to area and from period to period depending on the level of research and investigation that had been carried out. A 3-month consultation on the initial Step 3 findings generally produced numbers of amendments and additional sites.

4.2.5 Step 4 was the final assessment by English Heritage, both in a national context and in relation to the Step 1 characterisation. It identified frameworks for management and future conservation action for each industry, including designation but also a range of other mechanisms for protection, making specific recommendations for each site evaluated at Step 3. The model established in 1995 (Chitty 1995) was modified in successive Step 4 reports to reflect evolving policy. Selection for designation at Step 4 was assessed on national importance and representation, including rarity of period survivals, of individual types of site / structure and regional representation.

4.2.6 The management context for Step 4 recommendations included consideration of

- significance of the site as a component of a related landscape;
- condition of the site and buildings;
- suitability for adaptive re-use;
- potential and fragility of archaeological preservation;
- vulnerability to uncontrolled development or deterioration;
- existing protection and/or beneficial management regime;
- suitability for public enjoyment and educational purposes;
- need for conservation management resources (sustainability).

4.2.7 The type of protection recommended in the Step 4 report reflected the type of management regime which was judged to be most beneficial for the conservation of a site or building. Scheduling was recommended selectively for a relatively small number of nationally important sites for which unchanged preservation was judged to be a high national priority. Where buildings were judged to be better protected by being managed in continuing use, candidates were referred to the Listing section for assessment which was generally carried out separately.

4.3. Progress with MPP industrial programme to 2004 and legacy issues

4.3.1 When reprioritization for HPR effectively halted MPP programmes for designation in 2004, Step 1 reports had been produced on 33 industries and nearly 5000 sites and buildings had been evaluated in the field at Step 3 (see Table 1 below for progress with individual industries). Fourteen Step 4 reports were produced covering 20 industries with recommendations for over 1000 new SAM designations and over c350 candidates for listing consideration. Detailed summary reports for each thematic topic are provided in Appendix 1.

4.3.2 Implementation of the recommendations for scheduling was carried out by a team of MPP Archaeologists, each responsible for a region or sub-region. Their detailed evaluation of sites and professional judgement informed the final decision on whether scheduling would be the appropriate management action. This decision was often arrived at in dialogue with the local authority heritage or archaeological service and was one of the strengths of the programme. It allowed development, land-use pressures, planning constraints and other management considerations to be taken into account. In some parts of the country, where resources allowed, scheduling designation recommendations were followed through systematically but not in others. Listing assessment was carried out separately in a series of small TLR projects but increasingly, as the programme progressed, the scale of listing work emerging from MPP could not be handled with the resources available. Some of the later industrial projects, such as those for utilities and power, produced more than twice as many listing proposals as scheduling ones or had parallel assessment projects. The TLR project for water towers, for example, ran alongside the MPP project assessing the water industry. A similar situation emerged in the military programme with airfields. The issues around overlap and dual designation added to the impetus for a unified designation system

4.3.3 The extent to which recommendations for the industrial programme were acted on has been difficult to establish conclusively, involving as it does two separate designation systems. Searches of the RSM and LBS have established the number of designations for relevant classes of asset for the period from 1995 – 2008 and these are summarised in Table 1. Some 460 schedulings and listings resulted, out of 5000 detailed field evaluations. More detailed analysis could be achieved by correlating MPP ‘alternative action’ reports for individual sites (held in the NMR) and Territory lists of cases which were not progressed. For a proportion of industries, however, it is apparent that no designation programme commenced and there may be little to show in terms of increased statutory protection for some classes of industry, albeit that significant new research and understanding has been achieved.

4.3.4 Maximising the research and conservation management value of the MPP industrial programme archive could be an important outcome from this audit. Some pilot work has been done with Step 1 & Step 3 reports to make them available digitally on the EH / HELM websites and the NMR has a programme for transferring Step 3 data to the AMIE database. Paper copies were circulated to all SMRs and are believed to have been largely incorporated into those records. The reporting style and format was not designed for popular interest but the syntheses are highly regarded by HERs, as the only comprehensive, national overview of the surveyed industries; they form the basis for ‘local list’ designation in many areas. Reference copies are available in Swindon (NMR), Ironbridge and York (CBA), and a few are held in the EH London offices. Copies of the original reports and databases are scattered, some still being held by the consultants who carried out the research, others not available. Some of the electronic files were held on floppy discs and were not readable using available software. Creating a comprehensive, accessible guide to this paper and digital record, and digital access to the material where possible, will be a priority to ensure this legacy can be used. It is recognised that the introduction of the MORPHE framework for management of English Heritage research projects has now addressed many of these issues about best practice in archiving, dissemination and project management.

4.3.5 Importantly, for the future, the Step 1 and 3 **national overviews retain high research and operational value**. They enable individual sites, whether they come forward as designation proposals or in other contexts, to be considered within a national overview of the industry's range and character and known survival. They remain the most comprehensive and authoritative sources available for many aspects of the industrial heritage. The MPP programme was focused largely on the classes of extractive industry, inorganic manufacture, power and utilities. It began to encounter problems of scale when it tackled classes of sites and building (e.g. smithing, dovecotes, water management, bridges, electric power) which were poorly documented in existing records and widely represented in all regions, rather than in distinctive, defined distributions related to socio-economic factors, local availability of materials, power, and topographical character. The management options were diverse and MPP encountered precisely the same issues that the TLR was grappling with, out of which the HPR project was to emerge (see below 4.7.3 - 7).

4.3.6 National-scale surveys on the MPP model are unlikely to be justified or the most effective way in which to address protection for the industrial themes that remain to be tackled. Detailed assessment of the outstanding industries (see Appendix 1, e.g. clay, iron and steel, non-ferrous metal extraction) suggests that **regional and sub-regional approaches** - responsive to local historic character and landscape, environmental and socio-economic factors - will provide a finer grain and more manageable framework for larger-scale designation programmes where they are appropriate. It lies outside the scope of this report to assess the potential contribution of Regional Archaeological Research Strategies but these could be highly relevant for identifying regionally distinctive priorities.

4.3.7 SHIERs

Following the end of the MPP industrial programme in 2004, a successor programme of 'Strategy on the Historic Industrial Environment Report' (SHIER) studies, was started. These projects were national in scope, designed to provide an introduction to historic industries and to assess the current state of the resource, providing sufficient background information on levels of survival, protection, and significance to guide future designation. Essentially they aimed to provide a more streamlined version of the MPP Step process and were targeted at industrial asset types under particular pressure. A number were, or are, underway for the brewing, engineering and nuclear power industries (see Appendix 1). Lack of resources and strategic context for the work has impeded their progress but in principle this model appears to be a useful one for further development alongside that above.

4.3.8 English Heritage Building Selection Guides, which cover the monument classes evaluated in the MPP programme, were published in March 2007. The relevant ones are:

- Industrial Buildings Selection Guide (extractive and manufacturing industries)
- Utilities and Communications Buildings (for electric power generation, gas/oil, and water industries)
- Agricultural Buildings Selection Guide (for dovecotes)
- Garden and Park Buildings Selection Guide (for icehouses)
- Transport Buildings Selection Guide (for bridges).

These, and related DADs could usefully be enhanced by reference to the industrial programme research reports.

4.4 MPP: Recent military heritage programme – Background

4.4.1 Recent military heritage from the twentieth century, like industrial heritage, was under-represented in the schedule and lists, poorly recorded, and surviving in large numbers which presented a challenge for identification and selection. Just as many British industries had become redundant in the late C20th, there were also major changes in national defence policy which resulted in decommissioning of large numbers of installations from military use. A growing public interest in the protection of recent defence heritage focused on the 50th anniversary of the end of WWII in 1995 added popular support to this programme.

4.4.2 A strategic national programme of identification, recording and evaluation began in 1994 to assess all monument types relating to the defence heritage (Dobinson *et al* 1998). It was based on a large-scale, documentary survey of the PRO records of the modern military period as released under the 30-Year Rule. These remarkably thorough and precise records allowed a detailed picture to be recovered of military policy and design, what was built where and when for military purposes. The exhaustive documentary research on which the programme was based provides a robust and comprehensive basis for selection for the whole of the C20th resource, with a high level of completeness for many classes of military site.

4.4.3 Stage 1 was an archive-based resource assessment which looked at ten main classes of site, producing a gazetteer of sites and contextual information on design and operation of installations (see Dobinson's reports for CBA). This work is believed to be very sound and not in need of revisiting; it is as close to a definitive, authoritative statement of the primary resource as we are likely to get. These were

- Anti-aircraft artillery 1914 - 1955
- Anti-invasion defences
- World War II bombing decoy sites *
- Operation *Diver* sites (anti V-1s)
- Operation *Overlord* (D-Day Embarkation sites)
- Coastal artillery 1900-56
- Radar and acoustic detection
- Airfield defences in WWII
- Cold War
- Civil Defence in World War II

In addition, (excluded from this review) handlists were produced for 'Experimental and training sites' and 'Searchlight sites of WWII'. Evaluation of military aircraft crash sites, which produced conservation management guidelines (EH 2003), and the evaluation of WWII Prisoner of War Camps are also excluded from this audit.

4.4.4 Stage 2 provided a corpus of surviving sites for selection for the first eight categories of military heritage. Air photographs were used where practical to verify the existence and assess condition of the surviving sites (Mike Andersen, NMR). For some classes of structure, more detailed archive, map and local research was employed, verified by field assessment. Unlike the industrial programme, however, it was the exception for

sites to be evaluated in the field and the great majority were judged from air photography and mapping.

4.4.5 Stage 3 was the selection of nationally-important monuments, based on scoring at Stage 2 for completeness of survival, rarity and other criteria. Designation proposals were presented in a series of papers to AMAC and these provide the best sources for summaries of each group of sites and a schedule of those proposed for designation.

4.4.6 The MPP evaluations were complemented by TLR studies in parallel for other topics

- Military Airfields
- Cold War
- Naval dockyards
- Barracks
- Drill Halls, Army Camps, Command Centres (all excluded from review).

Detailed reports for each thematic MPP and TLR topic are provided in Appendix 1.

4.5. Progress with MPP recent military programme to 2004 and legacy issues

4.5.1 When the recent military heritage programme wound down in 2004, it had documented over 25,000 sites of which c20,850 were identified as surviving in some form (some 20,000 of these through the Defence of Britain project). Over 2000 proposals for scheduling were put forward. A detailed review of progress with ongoing research and protection of recent military heritage is on the English Heritage website together with many of the key documents and references listed below, <http://www.english-heritage.org.uk/upload/pdf/militaryreviewofprogress.pdf>. The programme has sustained an impressive momentum of strategic research and publication through the Military and Naval Strategy Group.

4.5.2 **Implementation of the recommendations for scheduling** was carried out by a team of MPP Archaeologists, each responsible for a region or sub-region. As with industrial heritage, they exercised discretion on whether scheduling would be the appropriate conservation management action in dialogue with local authority services. As resources allowed, designation recommendations were followed through more systematically in some regions than in others.

4.5.3 **The extent to which MPP recommendations were acted on** has been difficult to establish conclusively. The terms employed by the LBS and RSM differ for the same classes of asset, and cannot be retrieved easily in relation to the military assessment groupings, which are different again! Numbers of designations are summarised in Table 1 and are indicative rather than exact. The recommendations for scheduling were believed to be proportionate in relation to the scale of the original resource and its survival. Because, unlike the industrial programme, most sites had only been assessed from air photographs the percentage of designations which resulted was relatively modest, often 25% or less of those originally recommended for consideration. It appears that overall some 185 designations resulted either directly or indirectly from the programme's work. The scale of the Defence Areas project and its designation recommendations were particularly demanding and, coming at the end of the MPP programme, were not implemented. There also appears to be some unfinished business

in relation to Operation Overlord sites. The proposed Civil Defence evaluation study was seemingly never commissioned.

4.5.4 Maximising the research and conservation management value of the MPP military heritage programme has been effectively achieved. One of the strengths and lasting legacies of the project is the consistent and accessible publication of its research reports and their availability in a range of forms from online reports to technical guidance to popular guides and accounts. A research framework for future work is also published. The limited availability of the archive research reports and the outputs of the Defence Areas project remain to be addressed.

4.5.5 The programme achieved high public profile, increased awareness and remains a popular subject. The potential for using local designation to manage some of the more extensive and numerous types of site has still to be fully explored. The rate of loss of WWII sites is expected to be relatively high (coastal erosion, clearance, neglect, demolition) and therefore some review would be necessary before embarking on a revived designation programme where it appears to be justified. Satellite coverage available now would enable this evaluation exercise to be done effectively. The 'Stage 1' desk-based reports characterising each class of defence site, together with the Defence Areas study incorporating the Defence of Britain data, provide a robust framework for selection, both comprehensive and authoritative.

4.6. MPP Frameworks for evaluation and characterisation

4.6.1 In addition to programmes for evaluating particular groups of assets, the Monuments Protection Programme undertook research to provide a wider context for assessing particular classes of monument and to create frameworks for evaluation and management. This included a series of landscape-scale and contextualizing projects which has continued to develop through the work of the present English Heritage Characterisation Team. The projects identified in the brief for this audit are discussed below and recommendations are summarised in the spreadsheet. They are all of high current relevance.

4.6.2 Rural Settlement

The *Atlas of Rural Settlement* research project defined the characteristics and distribution of medieval nucleated and dispersed settlement in England and a series of provinces and sub-provinces with distinctive settlement and enclosure patterns (Roberts and Wrathmell 2000 and 2001). Based on early 19th century map data, the geographical analysis is now digitized and about to be made available to local authority heritage services as a GIS layer for use by HERs and in conservation management. One of the aims of this project, inter alia, was to provide a framework for evaluation and designation of nationally important sites of deserted medieval and later settlement. 'The new division of the country into settlement zones has allowed us to select nearly 2000 medieval and later settlement sites for assessment for scheduling' (Schofield 2000, 8). Deserted medieval sites in areas characterised by dispersed settlement in particular were recognised to have been relatively under-protected in comparison to deserted nucleated settlements. A start was made on a programme of designation under the new guidelines following Roberts and Wrathmell and was still very much work in progress when the programme was halted. Though excluded from this exercise, the parallel review of settlement types and evaluation criteria for the Roman period, though published (Taylor 2007), was not

developed to a satisfactory conclusion as a framework for selection for designation and merits further attention. Territory lists of outstanding scheduling work include numbers of rural sites of these periods.

4.6.3 Field Systems

Turning the Plough was based on a study of medieval field systems in the Midlands (Anderton and Went 2002; Hall 2002). This project successfully evaluated the survival of ridge and furrow across the champion landscapes of central England, identified the most coherent, surviving examples and made recommendations that certain townships (43 out of a sample population of c. 1600) should receive special attention because their preservation demonstrated something close to the complete layout of the high medieval system. The approach was in part pragmatic, because scheduling of large blocks of ridge and furrow would have been unworkable in management terms, and was also a way to draw other agencies with resources and influence in rural land use into the conservation debate on land management (English Nature and Countryside Agency at the time). There was some limited success in getting ridge and furrow, and in particular the 43 townships, accepted as priority targets for stewardship payments. It was envisaged (but not put into practice) that further collaboration with English Nature, now Natural England, on monitoring of outcomes would follow, and development of the approach in other parts of England with good survival of field systems, i.e. Yorkshire and the North East.

4.6.4 Cathedral Precincts

In the early 2000s reports were commissioned on each cathedral close in England, work undertaken by Peter Ryder. The aim was to produce a mini HER type record for each close to guide any designation strategies. York and Hexham precincts were scheduled on this basis and recommendations were drafted for Ely, Peterborough, Rochester and Canterbury cathedral precincts, to inform discussion about ecclesiastical exemption. A key aspect of the management assessment included defining structures, or parts of structures, which remained in use as a place of worship or for related acts of religious devotion. The assessments present an overview of information and understanding of the significance of cathedral precincts in terms of their national importance. These may still have some currency as models for developing management agreements under the proposed HPA approach and, more widely for Places of Worship, in the context of the Draft Ecclesiastical Exemption Order, Guidance and Code of Conduct.

4.6.5 Rapid Coastal Zone Assessment Surveys

English Heritage initiated a programme of Rapid Coastal Zone Assessment Surveys⁴ (RCZAS) in 2003, to improve understanding of the historic coastal environment and assess the risk posed by Shoreline Management Plans (SMPs), strategic high-level plans that set the long-term policy for coastal management. The Surveys are ongoing and by 2008 had been completed or were under way along the entire east coast, from Berwick to the North Foreland in Kent, in north-west England between the Dee and Solway, and in the Severn estuary. Briefs to undertake survey of the remaining parts of England's coast are in development, in collaboration with Local Authority and other historic environment professionals in those areas.

4.6.6 All options for managing coastlines, including 'managed realignment' and 'no active intervention', have potential impacts on the historic environment. The primary aim

⁴ Full information on these extensive surveys is available at <http://www.english-heritage.org.uk/server/show/nav.18389> from which this summary is extracted.

of the Surveys is to make a more informed input to SMP consultation and development to ensure effective mitigation of the effects of coastal change through the 21st century. They also provide an authoritative data-base for further research and in the development control process. RCZAS were not designed to provide a framework for selecting sites for designation and the way in which the surveys have been conducted has varied from region to region. They do, however, highlight sites of 'special interest' requiring more detailed investigation and they provide a rich and authoritative resource for any future programme for designation on the coast (and overlap to an extent with the military heritage projects which include large areas of coastal assets). The place of designation in the policy framework for coastal heritage management has yet to be developed but, since many of the sites in question are on a trajectory towards destruction by erosion or permanent flooding, there will need to be a clear case for where and why designation will be the preferred mechanism for managing that process.

4.6.7 MPP Area-based studies

A number of area-based evaluations were also commissioned for the MPP to review the protection required for nationally important archaeology in areas with particular management issues. These aimed to assist in developing a better informed approach with key stakeholders and to assess whether current designation coverage was adequate. The projects identified for audit include surveys of the non-tidal River Thames, New Forest and Rock Art and are summarised in Appendix 1 with recommendations.

4.7 THEMATIC LISTING PROGRAMME 1995-2004

OVERVIEW OF PROJECTS

Background

4.7.1 The pre-history of the thematic listing review (TLR) is familiar and needs only to be touched on briefly here. Prior to the mid-1990s, the traditional approach to listing was geographical. Heseltine's accelerated listing resurvey was set up in the spring of 1981 and was launched the following year. He first proposed to finish the survey within the decade, then within three years, 'some twenty years sooner than would have been achieved under the present time scale'. The Heseltine review drew upon both county councils and the private sector, and was carried out in two bites, using first public and then private contractors, beefed up by DOE (later EH) staff to manage around 80 fieldworkers. The difficulties of grappling with the scale of the challenge within the current statutory context became quickly apparent.

4.7.2 Because much of the accelerated resurvey was carried out in rural areas (although there were major exceptions to this such as Liverpool), it came to be seen as not responding to the greatest development threats, which were urban. Whilst the main driver for downscaling the programme was government reluctance to sign up to funding seemingly endless designation programmes, the need to prioritise urban areas had some merit. But the accelerated urban review was flawed from the start. Its original remit was very limited –each urban review would revisit every listed building and then consider candidates put forward by the local authority. There was never any intention to achieve comprehensive evaluation (and a 'definitive' list). The more energetic conservation officers put forward large numbers of candidates; less committed or poorly resourced authorities did not, thereby perpetuating the imbalance of coverage from area to area.

The urban review largely failed to meet its principal targets. Schedules slipped, raising the spectre that the programme would join the list of ‘never-ending’ designation programmes. The review also often failed to address the building types or areas most in danger, especially those within inner-city industrial quarters under threat of redevelopment pressure. Analysis of the urban reviews carried out in the early ‘90s showed that between 25% and 33% of additions to the lists were of *small objects* such as street furniture and churchyard and cemetery memorials. A substantial proportion of the remainder was of late 18th/early 19th century town centre houses that had been dismissed during earlier surveys as not listable owing to alterations (usually shop windows)⁵. This situation underlined one of the justifications for HPR: although these assets were important, it was considered that listing involved a disproportionate use of resources (of a national body) to deal with matters that might be more economically (and appropriately) handled by local authorities. Geographical approaches combined with the mandatory nature of listing were not targeting the assets most in need (was not fit for purpose).

The thematic list review programme grew out of this situation.

Approaches

4.7.3 Broadly speaking, there were two approaches to thematic listing: one was to attempt as **comprehensive a degree of coverage** as possible for each building type, the other was to evaluate a number of examples of each building type that would then serve as **benchmarks for further listing**. Both had their strengths and weaknesses. The idea of achieving comprehensive coverage for a given building type was quickly found to be impractical. With some MPP modules, listing assessment was carried out separately in a series of small TLR projects (mostly industrial) but increasingly, as the programme progressed, the scale of listing work emerging from MPP could not be handled with the resources available (see MPP overview). There was also growing concern within EH that the long-term national overviews of those industries that had been brigaded into the final stages of the MPP might never materialise, given the organisation’s straightened resources and competing resources. Regional teams were concerned that national programmes were not meeting immediate conservation needs, especially in cities such as Liverpool and Manchester which were undergoing aggressive redevelopment within what was often a political environment hostile to heritage-led regeneration.

4.7.4 Studies of other generic groups, notably textile mills, were conducted as part of the TLR from the outset. The intention was to cover the country’s major textile manufacturing areas on a region-by-region basis working from research into the industries either already undertaken or commissioned. To date, the Manchester project is the only one seen through to completion. Tight resources and competing priorities meant that progress on the other mills surveys was not sustained as planned.

4.7.5 But comprehensive projects focussed on smaller areas could work well, especially those that were set up as a direct response to specific conservation planning challenges. We make much of what we see as the merits of *intensive area surveys* in our conclusions and recommendations. Examples of well worked through projects of this sort include Cornish chapels and Birmingham Jewellery Quarter (for details see Appendix 1). The former was about as large-scale a project of this sort as could be handled by a small team

⁵ Personal recollection: the data was contained in a paper to HABAC (date uncertain).

—it involved inspection of *every* recorded chapel in the county. But it did result in something approaching a definitive list and provided a sufficient degree of certainty to allow the faith communities to manage the future of their historic building stock in reasonable confidence that there would not be large numbers of eleventh-hour designations coming out of the blue at a later stage. ‘Removing uncertainty’ became something of a mantra in the 1990s. Recent work on the economic, social and demographic forces at work on the large number of Cornish chapels suggests that an alternative approach might work better, based on a full understanding of the nature and significance of the resource but with greater emphasis being placed on alternative management regimes. The same applies on a smaller scale to BJQ and a similar lesson might be learnt. A large number of listings resulted, reflecting the special context and pattern of survival within a closely defined area. BJQ got as close as any TLR module to a designation exercise morphing into comprehensive conservation exercise. Was saturation listing necessary? In principle, a heritage management agreement on the lines envisaged by HPR would fit perfectly with the needs of the quarter, but failure to successfully synchronise parallel activities (such as an audit of the business base in the quarter) and, crucially, the failure of the planning consultants to fully grasp the direction of travel, would have made dependence upon alternatives to listing too risky. **One of the important observations gleaned from this ‘legacy audit’ is the importance of high-quality project management documentation, to enable lessons to be learnt about the strengths and weaknesses of previous projects.** The importance of high-quality project management is addressed in section 5 of this report.

Management benefits

4.7.6 A number of projects were co-financed, e.g., with the MOD. This was because all parties saw the benefits as: (a) achieving clarity over designation and constraints, thereby providing a degree of confidence and stability for future site management and property disposals; (b) raising awareness among site managers about the significance and conservation needs of an historic estate, both for buildings and archaeology; and (c) disseminating the results of research to inform the wider public. It was among the weed-choked canals of the Waltham Abbey gunpowder site, the empty acres of East Anglian airfields and the commercial heart of Milton Keynes —and many other places— that the seeds of HPR were planted. Here and there pragmatic decisions might be made prior to the final assessment results being available to free up parts of an awkward estate to enable development to take place that would make a site sustainable; negotiations were sometimes possible to trade close-run issues of significance with operational necessities; and there were occasional opportunities to test alternative management models during what could sometimes be very long waiting periods between the submission of recommendations and ministerial decisions. But all these subterfuges worked around rather than with the legislation that it was fast becoming apparent was not wholly fit for purpose. And when other (non-heritage) sector pressures became overwhelming, expectations suffered, tempers frayed and even the best partnerships began to unravel.

4.7.7 Much of the time and energy of staff involved with TLR were taken up with exploring ways of resolving these problems in a more open way. Various strands of thinking converged, learning lessons from the intractable aspects of listing designation. Notable among these were the development of management agreements and conservation plans. This is not the place to discuss these in any depth but the TLR was one of the main drivers behind both. EH’s first forays into the first area resulted in a policy paper *Developing guidelines for the management of listed buildings* (EH, 1995) that was

stimulated by the challenges of managing large post-war structures within the constraints of conservation conventions that were designed for another era. The progeny of this initiative, particularly *Streamlining listed building consent. Lessons from the use of management agreements; a research report* (EH/ODPM, 2003) was a clear precedent for HPR heritage partnership agreements. The case studies were exclusively (mega)-buildings listed under the post-war listing programme. The impetus behind EH's engagement with conservation plans may also be found in the sorts of issues confronting TLR - large and complex sites –sites that often lay at the margins (or even beyond) the consensus view of what constituted 'heritage'. The first fruit of this was a major conference held in Oxford: see Kate Clark, *Conservation plans in action* (EH, 1999). Conservation plans provided a mechanism whereby all the relevant factors and interests would be set out and assessed in order to reach sustainable long-term solutions. In short, whatever the merits or demerits of the thematic listing programmes in terms of designation, timeliness or contribution to knowledge, they did provide a sort of cauldron in which many of the key HPR issues could be forged. As such they served an essential purpose and in this respect alone represent a worthwhile investment of EH resources.

Public consultation and engagement

4.7.8 In March 1995 Stephen Dorrell opened up the listing programme to public consultation. His main concern initially was to break the mystique that surrounded listing and excluded the owner of a property to be designated: why should an owner be the last person to know only when the anonymous brown envelope containing an official notification came through the letter box? But it marked a sea change. Thematic listing projects were the first to be subject to consultation that went beyond peer-group validation and the individual owner (common fare for MPP) to engage the wider public. The potential was enormous. The most elaborate consultation exercises related to the post-war programme (and are dealt with in the relevant report in the appendix to this audit). The potential was seized –not least through the commitment of EH's then chairman- to use the media to create a national debate about post-war architecture –a debate that both reflected and formed public opinion that turned out to be far less hostile than critics had anticipated. But even adequate public consultation and publicity was resource-hungry and could impose unreasonable stresses on staff. To 'manage the media' and carry out *meaningful* consultation (workshops, seminars, exhibitions) involved time, training and a generous budget. Many of the thematic projects fell by the wayside simply because these resources were not available. We return to this point in the final section: suffice it to say here that, in a climate where public relations and community engagement are much more central to EH's work than was the case in the 1990s, the demands of publicity and consultation should not be underestimated and resources should be made available on the basis of realistic estimates of what services need to be bought in and the demands on staff time (including public affairs).

Research and the contribution to knowledge

4.7.9 As will be clear from our findings and recommendations, the thematic programmes (MPP and TLR) have made enormous contributions to knowledge. On the listing side, much of the 'grey literature' was often ephemeral –notes to aid assessment, culled from published sources and limited documentary trawls etc- and once the assessments were made and (ideally) the designations put in place, they lost much of their value. This accounts in part for the difficulties encountered in locating much of the primary material upon which to base this audit. (The other main reason was the dispersal and loss of much material when HPD was dispersed.) But much of permanent value has

been achieved. The reports in the appendix underline the scale of the publication enterprise: major new contributions have been made in fields as diverse as the history of model farm buildings, barracks, drill halls, naval dockyards in the early days of steel and steam, ordnance yards, Cornish chapels and much more. Partnerships with other EH teams, notably RD, have produced outstanding original work on subjects such as the Cold War and the Birmingham Jewellery Quarter. An early generation of leaflets that aimed to explain building types being assessed for listing and explain the reasons and mechanics of listing (*Understanding Listing*) have been supplanted by the *Informed Conservation* series –not a ‘second best’ to the major research monograph (which, thankfully, EH continues to publish or support)- but a publication venture in its own right: small, accessible, finely illustrated and authoritative books that offer new research findings and contextual interpretations that also provide a conservation message –why these things are important, how they might be conserved and contribute to the economy and the quality of life. These books, now reasonably marketed, sell well: they even appear on university course reading lists!

5 RECOMMENDATIONS FOR GUIDANCE

5.1 OPTIONS FOR DESIGNATION

5.1.1 One of HPD's main requirements from the audit of past thematic programmes is that we should identify the basis on which designation recommendations from each project were made and assess whether they should still stand, based on an HPR approach. In this section we set out some options for taking forward recommendations made in the thematic projects and indicate a suggested direction in the future for those that were not concluded. To understand the legacy of each project and to assess its fitness for purpose under current designation policy, we have considered three aspects.

5.1.2 The first consideration has been whether the thematic study was satisfactorily concluded as intended with a proportionate number of new designations⁶ or other beneficial management actions resulting. If that was not the case, we have attempted to assess, by means of sampling individual recommendations where necessary, the scale of the uncompleted work, highlighting any particular issues that were obstacles to completion and which may offer lessons for the future. Where possible we have suggested how the unfinished business could be tackled in a realistic way, based on the quality of legacy documentation and current relevance. For the latter, key considerations are the level of risk to particular asset types, the options for conservation management and the effectiveness of national designation as a tool to manage that risk.

5.1.3 Secondly, we have been struck by the rich knowledge-base that is a legacy from the research and consultation programmes, sometimes major ones, which formed the basis for many thematic projects in the MPP and TLR. This has enormous value, crucially for HPR as reference and guidance material in the future. It provides both a context and platform for further research and much of it is also of high operational value for management decisions about future designation and conservation action. We have therefore indicated where it appears that the research and / or operational value of a past project has not been fully realised through dissemination or publication. This requires action, in many cases not needing much additional resource, to realise the intellectual and financial capital invested in past projects.⁷ We have also indicated where we found that projects have been exemplary in ensuring that their outputs are widely available, in different formats for a range of uses. Availability of knowledge about significance, guidance for best practice and SPD can be as influential as designation in protecting heritage assets. HELM and other web-based facilities clearly offer a window for promoting the widest availability of these resources for use, and as models, for local authorities.

5.1.4 Thirdly, we have highlighted projects which are particularly suited to an 'HPR approach' to conservation which includes plural solutions and flexible approaches adjusted to local situations that can protect as effectively, but with a lighter hand than statutory designation has allowed in the past, within or alongside other frameworks for managing change. In particular we have identified projects that are suited to taking

⁶ For some projects, it has been problematic to establish what designations actually resulted from the recommendations made for MPP and TLR; the figures provided in Table 1 should be regarded as approximate.

⁷ As noted earlier, the MORPHE framework for management of English Heritage research projects has now addressed how these issues should be handled in a more integrated way in the future.

forward through an HPA, or management agreement approach, for complex, multi- asset situations; and through a character area or landscape-scale approach. The HPR approach includes an integrated way of working with designation and some problematic areas of listing / scheduling overlap identified in past projects are identified which it will be beneficial to work through in terms of new unified designation policy.

5.1.5 Finally, in the spreadsheet, which brings together the options assessment with individual recommendations, we have indicated the provisional thematic programme topics that appear to be the best fit for legacy projects. The spreadsheet format, which was required in the project brief, provides a rapid means of checking the current state of play, but it is important to refer to the reports contained in the appendix, where strengths and weaknesses are more fully assessed and options more fully outlined.

5.2 RELATED ISSUES

The legacy: still fit for purpose?

5.2.1 The 'legacy' thematic projects that we were asked to review are a diverse group. Together they represent an enormous investment of research and much of the material has lasting value either as a body of knowledge (published and unpublished), an important record of tried and tested procedures (and sometimes found wanting), or both. There is much to be proud of. The MPP set a national standard and created a national framework for assessment. It used existing records and current specialist knowledge to gain an overview but many projects went much further. For military and industrial heritage and for medieval settlement, they were major research programmes in their own right. They still present unique, authoritative and comprehensive statements of the range, chronology and character of these particular heritage assets. The 20th-century military heritage programme, sometimes involving innovative partnerships between the listing and MPP teams, produced good outputs, and created an excellent web-based reference library / resource that is still maintained. Some of the 'benchmarking' type projects (see below, 5.3.8 onwards) also produced excellent publications. The industrial programme generally lacked the same level of accessible and informative general publication and popular presentation necessary to engage although the TLR took up this particular baton, driven (after 1995) by the requirement to carry out formal public consultation.

5.2.2 The post-war listing programme was particularly successful in providing high-quality research and publications and raising popular awareness. TLR responded to the need for acceleration in those under-researched areas likely to be more amenable to listing than scheduling. It was experimental, generally rather poorly documented and less consistent in approach and methodology, and was geared towards meeting immediate management needs. It is important to recognise the achievement of these programmes, both in terms of actual protection and their contribution to knowledge. The publication record is impressive. Both programmes operated in an environment of seriously reduced resources. Over both hung the question: can we afford, and do we need, large-scale national surveys?

Legislative families

5.2.3 MPP and TLR operated within contrasting legislative frameworks. Scheduling takes assets out of the planning sphere and favours minimum change for assets out of

use (preservation); listing, and the registers, nest within the planning legislation that recognises the need to manage change (conservation). The statutory division was reflected in structural and operational divisions within EH and the conservation profession at large. Scheduling was seen to have greater flexibility (discretion) but progressed slowly, recognising that the attendant consent system is both onerous and inflexible. The MPP approach was to characterise and assess the scale of resource; evaluate significance of assets; and identify appropriate management regimes using designation sparingly. Listing was seen to operate within the straightjacket of being a mandatory designation and the primary management option for conservation although the LBC procedures were inherently flexible. There was much productive cross-divisional dialogue and collaborative projects: the quest for a more flexible management regime for buildings stimulated experiments in the areas of management guidance and agreements and conservation planning. Current legal interpretation places less emphasis on the stark distinction between supposedly mandatory and discretionary powers and privileges **the notion of reasonableness**. This lies at the heart of HPR (where, according to the old currency, the loss of discretion is seen as a major impediment to sustainable management of the archaeological resource, especially in towns and cities) and **needs to be rigorously tested**.

Cultural divides and research strategies

5.2.4 The statutory divide tended to exacerbate organisational, professional and cultural divisions between archaeology and architectural history. This tension has been substantially reduced in recent years although it occasionally rears its head and is seen by some managers as still presenting obstacles to integrated project work. There still remains a choice between scheduling and listing for the designation of many structures. Until recently, while legislative reform looked likely to take place, the need to reformulate policy to reflect integrated approaches was not a priority. Now that has changed, a restatement of the HPR position in a world where two parallel legislations still operate will be important for a coherent designation programme. If 'listing' is to become the default option for protection of all built heritage (whether preserved in, or out of, use), its emergence as the dominant designation will need to be handled persuasively. This aside, other cultural barriers threaten to impede progress on HPR priorities and need urgently to be addressed.

Expectations and implementation

5.2.5 **There is undoubtedly some significant unfinished business from the MPP national programmes.** Designation recommendations from several major projects have never been implemented and expectations remain in the sector, which holds the MPP's achievements in some affection, that a new scheduling programme will resume and on a national scale. Territories still have lists of sites that have been identified for SAM designation but were never progressed. **There is no longer a framework in which to progress them.** MPP created a cadre of designation professionals (MPPAs) who implemented designations but were not engaged with developing the strategic national overview or with carrying out the research on which the selection for designation was based. The volume of designation proposals produced by the programmes exceeded the capacity of staff on the ground to implement them. Prioritisation, it seems, varied from region to region, according to perceived regional need and personal interest. The move of HPR teams to the territories appears to have gone a long way to creating a convergence of priorities (although the dispersion of listing

staff, in particular, has played havoc with the documentation, some of which has disappeared). Getting the right balance between the weight of strategic research investment, fit for the task, and resources for the execution of designation action on the ground, will be a critical success factor in the future.

Applied research

5.2.6 There remain some tensions between those who pursue the more academic research agendas, on the one hand, and those who have to meet the immediate challenges thrown up by development and other threats to the historic environment, on the other. Closer cross-team working will go a long way to resolve these and there may be a case for **providing training for research staff** who are not directly engaged in externally oriented work **to understand the day-to-day and strategic management needs** of the organisation (in HPR, regional casework, properties etc). It is also important to ensure that research briefs are clear as to management goals and the positive role research plays in achieving them. (This reflects a wider sector issue about the (poor) quality of research briefs for planning purposes.) **The proposals we set out in detail in 5.3A will go some way to meet this ‘awareness deficit’.**

Research and dissemination

5.2.7 Following immediately from this is the fear among some that ‘strategic research’ will be ‘poor quality research’ (i.e., rushed, full of holes and unchecked references etc.). Most research carried out by EH will be applied in the sense that it will *specifically* support priority programmes: the ‘study of the historic environment and its sustainable management’, enabling new discoveries to feed into ‘evidence-based policies and practical guidance’ (*Discovering the Past, Shaping the Future: Research Strategy 2005-2010*, 1.1). **Research should always be of the highest calibre but fit for purpose.** The specific purpose of the research should always be made clear to manage expectations. The **research constraints need to be spelt out clearly:** MPP always made the limitations of its assessment and research clear; TLR was less consistent in this regard.

National and local coverage

5.2.8 **Except for some special cases, our view is that national designation surveys will rarely be justified now.** One of the lessons from the ‘legacy thematics’ is that **national surveys**, however high quality the results, **involved a disproportionate investment** (in-house plus consultancy resources) in terms of planning, research and assessment for which it was not always possible **to justify their management outcomes** and, more often than not, their contribution to knowledge (i.e. the knowledge gain was considerable but not always proportionate or sensitive to what was needed for the purposes of heritage protection at the point of delivery). Their slow progress and perceived lack of responsiveness to local management needs in the sector caused frustration. The good was also the enemy of the best in some projects. The best-preserved and most significant 2-3% of assets, where designation was critical for protection, was clearly identified, but sometimes never designated because of the large number of other possible candidates that overwhelmed the implementation process. The potential for using the outcomes of national surveys for wider conservation management purposes was also seriously compromised because the outputs at a national scale were - unavoidably - not accessible or serviceable for the diverse needs of hundreds of local planning and heritage management services. New heritage protection programmes can

take place within a much more finely tuned framework of regional policies, spatial strategies and research frameworks, within which LDFs and local authority heritage strategies are nested.

Justifying national coverage

5.2.9 The notion of ‘national designation programmes’ was unwieldy in practice and, uncoupled from spatial planning and research priorities, it no longer fits well with English Heritage business or with the need to engage with local communities and address their socio-economic situations. The choice of statutory protection to safeguard public benefit, educational and research potential will, for most archaeological sites, depend primarily on local circumstances, level of risk and the type of management action needed. The concept of ‘national importance’ as the criterion for protection, even used with discretion, is beginning to be challenged and is - or was - intended to be subsumed in ‘special archaeological interest’. The language of the new PPS, and the concepts behind it, will be critical for reformulating the basis on which sites and structures that are primarily of archaeological interest will be managed to achieve preservation through the planning system. There will remain a place for national-scale overview projects - but not definitive surveys - in emerging areas of designation where the evaluation of context and character is not well developed (such as sites of archaeological interest without structural remains e.g. lithic scatters and palaeo-environmental deposits). The same will be true for evaluating innovative modern building design and function (e.g. renewable energy installations, eco-buildings).

5.2.10 For later periods, a review of the specialist literature combined with specialist consultation (as in the early MPP steps) will be sufficient to justify homing in on areas where a regional or even smaller-scale survey is intellectually defensible. Textiles is a good example: fabric from natural fibre was made everywhere but there is a consensus that recognises certain areas as having special significance in national terms: for the modern period it is Lancashire for cotton, West Yorkshire and Gloucestershire for wool, Nottinghamshire for lace, Leicestershire for hosiery etc where, from the 18th century the scale and dynamics of production and technological innovation changed gear. Birmingham’s Jewellery Quarter is another good example but on an even more localised scale.

5.3 MODELS FOR HPR ASSESSMENT

5.3.1 EH **research** falls generally into one of three **categories: Foresight** (helping to respond to medium and long-term future needs such as climate change); research responding to **imminent threat** (casework priorities) and **strategic research** (identifying useful research trends and under-researched asset types and also preparing the research base for property repair, documentation, visitor information and dissemination). Generally speaking, designation reviews have focussed on the latter two categories, but have taken a variety of forms, which it is useful to categorise. Because the intensive area assessment model contains so many of the elements that are key to the success of any thematic designation programme, we place it first, but this does not imply that the other models are of less value: the ultimate objective will determine the choice of approach.

Lessons from successful legacy projects show that the key elements are:

- ❑ **partnership with stakeholders;**
- ❑ **integrated teams and project management;**

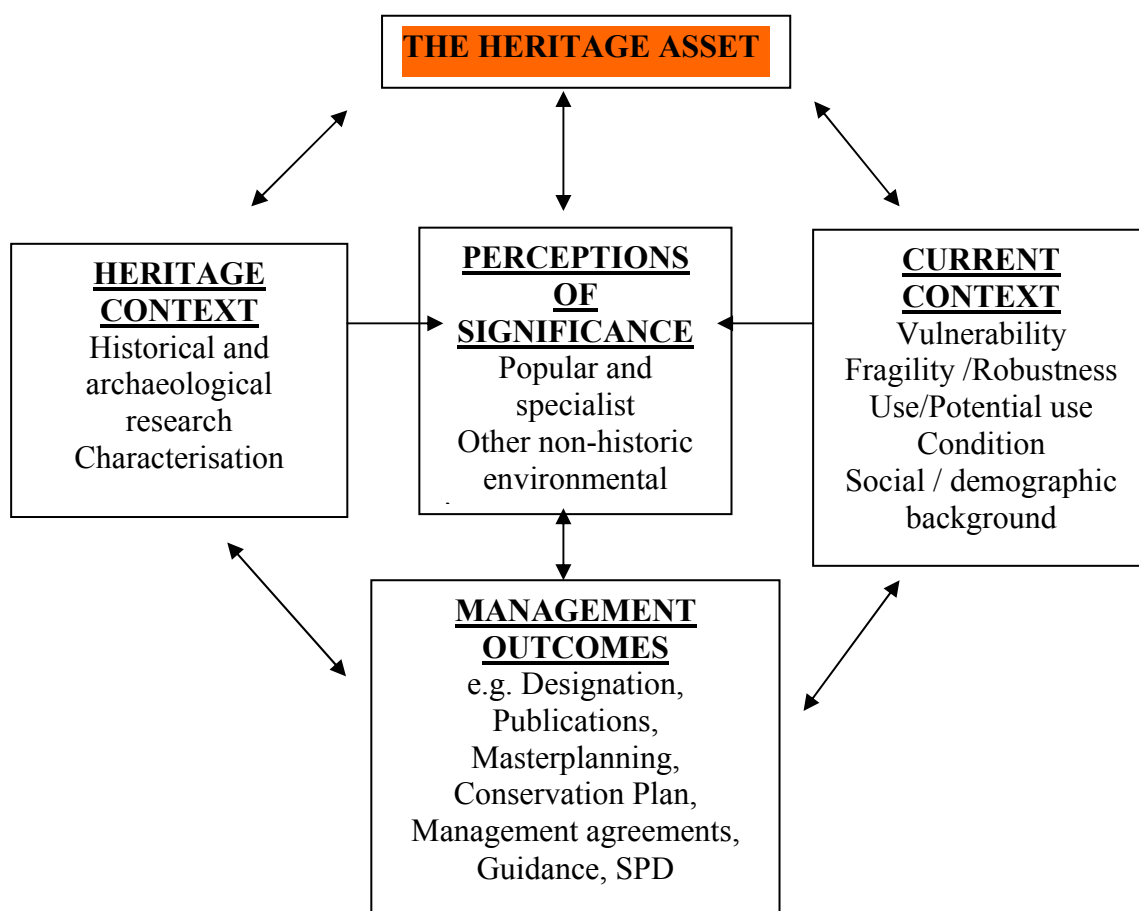
- ❑ **targeted research bespoke to conservation management needs;**
- ❑ **appropriate documentation and dissemination planning;**
- ❑ **the building-in of relevant conservation planning elements from the outset;**
- ❑ **and other related assessments where appropriate (socio-economic, environmental, landscape).**

A Intensive area assessments

5.3.2 We have characterised one of the more successful component types of the ‘legacy’ thematic programmes as ‘**intensive area assessments**’. Successful examples include industrial areas where the industry concerned was seen to comprise a concentration of assets that were of national significance in terms both of the survival of buildings and sites and also of the industry itself in a national economic context. The projects **broadly share a methodology** or approach that can be summarised thus:

- Phase 1 Targeted historical research and building / site analysis at an *appropriate* level;
- Phase 2 Major report, easily accessed by those who need it together with full consultation documentation providing justifications for all of the designation and other management proposals;
- Phase 3 Good quality publications, possibly a monograph and/or a more popular format combining academic integrity with a conservation message.

5.3.3 These get close to meeting what we see as the minimum requirements for a successful designation assessment project. The scale will vary: other examples at different scales and responding to different management drivers (taken from among the legacy projects reviewed here) included a county-based approach (Cornish chapels), a navigation management (non-Tidal River Thames for Environment Agency), cathedral precincts (for FACs), and a National Park (New Forest). The fact that the latter three initiatives did not successfully conclude in designation programmes illustrates how much more is required if the synergies of skilled staff are to be harnessed and the needs of the historic environment met. The following diagram indicates the components that –again ideally– should be present if all the desirable outcomes that HPR aspires to are to be achieved.



5.3.4 **These projects should always be partnerships** with the relevant stakeholders –with local authorities, regional teams, property managers and other key interest groups. The MPP was always conducted and implemented to varying degrees in partnership with local authority services and in response to local and regional circumstances. The TLR similarly worked in partnership with local authorities (indeed it was a central plank of the accelerated urban list review approach). Both programmes were also well engaged with communities of interest in the sector, and specialist peer review. These projects should always be managed or steered or guided by a representative body at the highest level proportionate to its size, complexity and political sensitivity. HELP provides a good governance model. Such **partnerships also go some way to ensure that these projects do not become a relatively unproductive burden**. Recent analysis has shown that, for a variety of reasons, the choice of designation and assessment activities has not always taken full account of the availability of resources on the ground to sustain their momentum and bring about the desired outcomes.

5.3.5 In EH-driven projects—and bear in mind that these should aim to provide models for the sector- the context can be established by EH staff or consultants using the range of research and analytical skills in which they excel (HPR, RD). **It is also essential to understand the current context and condition of the asset to judge its amenability to various types of management regime** (this was a constant element of MPP Step 4, but seldom used in TLR). All the elements contained within the diagram are essential ingredients of conservation planning –bread and butter for inspectors and area advisors- but there is no reason why they should not be taken into account in parallel with the

assessment of asset significance. Surveys of use and condition can enhance public perceptions by clarifying threat but also in some cases by identifying potential (see Appendix 1, textile mills: Manchester). Perceptions of significance will not be limited to specialist views: public consultation –a requirement for TLR- provides the vehicle to engage local communities and other interest groups and also to provide a channel for public participation in decision making. Programmes such as HELP have involved outreach staff in community engagement activities.

5.3.6 Studies of relevant social and economic factors are often critical to finding sustainable solutions: lessons learnt from legacy projects suggest the merits of conducting these studies (or using analyses if already to hand) **in parallel with the assessment of significance** in order to alert responsible parties to the desirability of adjusting policies. But they do need to be genuinely integrated into the project wherever possible. In Birmingham (see Appendix 1, BJQ), a highly relevant and important review of the current manufacturing base of the Jewellery Quarter was conducted at the same time as the heritage assessment but the implications of its findings were never wholly incorporated into the management plan for the area, which remained essentially building based⁸. In another legacy project (see Appendix 1, Cornish chapels), a high-quality historic buildings assessment and an economic/demographic analysis⁹ were both carried out and both involved EH staff but consecutively (rather than concurrently, which would be the ideal state) with a substantial time gap between them. The results of the economic/demographic work are as crucial as the historic building assessment for the future of the historic buildings stock (designated and undesignated) but the time gap between the two components meant that designation staff had moved on to deal with other priorities, the wider issues being handled in another department (characterisation): significant implications of one activity are in danger of not feeding into all aspects of decision making, and the synergies have not been realised –this mistiming presents obstacles, although not insurmountable ones.

5.3.7 In our view, the new holistic context provided by HPR creates opportunities to construct viable assessment and management programmes for key heritage areas and landscapes, in which designation plays a critical role, but only one role among many. The approach:

- Requires teamwork and a mutual understanding of objectives and individuals/teams role in meeting them.
- Provides opportunities for training, both in-house/cross departmental and on-the-job training with other bodies such as LPAs.
- **Fulfils and promotes EH's conservation principles** regarding:
 - Promoting the historic environment as a shared resource;
 - Encouraging participation, both professional and for the wider public;
 - Bringing specialist and non-specialist views of significance centre stage;
 - Seeking out sustainable solutions at the earliest stage in the process;
 - Creating a platform for transparent and consistent decision making;

⁸ It demonstrated the narrow base of traditional industries, highlighted the need to attract small to medium sized enterprises and the desirability to adjust the city's policy towards asset sales in the quarter.

⁹ It demonstrated a marked mismatch between the current distribution of households and historic chapels, which are not well located to meet demand for new uses.

- Providing adequate documentation to enhance understanding and provide lessons for future initiatives.

B Benchmarking approach

5.3.8 *The need for access to documentation*

In *intensive area assessments* there was normally an attempt to achieve a reasonable degree of comprehensiveness. But it was always appreciated that, however diligent the survey, things would be missed, new research would uncover unrecognised significance, or features or buildings that were once concealed might be revealed. MPP, based as it was on already published, recorded or already known (within the specialist sector) assets, worked on the calculation that only a very small proportion of the archaeological resource is known and more was bound to surface. Furthermore, understanding, appreciation and, indeed, taste change over time and assets once considered to be below the mark might pass muster for designation at a later stage. Listing policy (accepted by government) always operated an informal ‘five year rule’: listing cases would not be re-visited within this period unless solid new evidence were provided. Certificates of Immunity from listing also work on a five-year timescale.

5.3.9 The implication was (and is) that it is reasonable to acknowledge that values of significance change over time and that a five-year timescale seems a *reasonable* period after which to allow re-assessment to take place. **Given increased rights of access to information and the government mantra of openness, it remains important in cases like this to demonstrate precisely how the parameters of decision-making might have changed over time when a contrary judgement has been reached.** On the listing side, at least, the relevant documentation is not easily accessible: in many cases we found that staff simply did not know where material was stored, or sometimes even about its existence. The scale of this problem is evident from the detailed analyses provided in Appendix 1. **An electronic catalogue of all material (digital or paper) should be accessible to all members of staff** if not more widely. This is particularly important when questions of consistency are raised or when designation decisions are used as benchmarks for deciding comparable cases elsewhere.

The three categories that follow are not mutually exclusive.

5.3.10 *Benchmarking by exemplar*

Current *listing* policy on this issue is set out in PPG15 (6.12 –our emphasis):

The approach adopted for twentieth century listing is to identify key exemplars for each of a range of building types –industrial, educational, residential, etc.- **and to treat these exemplars as broadly defining a standard against which to judge proposals for further additions** to the list. (6.12)

5.3.11 Unlike intensive area assessments, many assets are too numerous to justify any attempt at comprehensive coverage. The principle established in PPG15 seems to us to be fit for purpose whereby (a) outstanding examples are identified and designated at high grades; and (b) a sample of assets of special interest is arrived at through rigorous research and assessment, which will provide a benchmark (or ‘standard’) for future designations. Because views about significance will change over time, standards will also change, **but the whole process should be documented, allowing the change to be justified (audit value) and recorded for history (archive value).** Many programmes

identified as HPR priority topics will be amenable to this approach, including e.g., civic heritage, places of worship, sports buildings, as well as the post-war programme itself (where the documentation needs to be more easily accessed). Any inter-war assessment programme would also benefit from this approach. **Buildings in this category are likely to require a high degree of research across a wide range of specialist material and might involve difficult, technical decisions about designation: this would justify EH (HPD) taking the leading role.**

5.3.12 *Benchmarks and guidelines for the sector*

There will be occasions when EH will not wish to lead an assessment programme, even though it may involve designation. In the case of schools, for example, there is no way EH could justify a systematic national listing programme even though the assessment and re-use of historic schools is a corporate priority. Current HPR thinking on schools seems to be moving in the right direction (see detailed report) despite a number of teething problems (of the sort that are addressed in 5.3A). It involves the publication of guidelines to help local authorities and others make a judgement as to the likely ‘listability’ of a school and a model area evaluation to enable them to assess the total building stock of their areas for general planning and management purposes along the lines set out in EH’s brief for schools (currently on the HELM web site). Many other asset types are amenable to this approach. It is especially useful for the assessment of buildings that are likely to assume their significance from setting or context (rather than intrinsic ‘special interest’), and where future management will be through special area planning mechanisms or conservation area controls: suburbs are a good case in point, where EH has a critical mass of experience that should be directed to drawing up models of good practice in an area where responsibility for both assessment and management lies almost entirely with the local authority.

5.3.13 It should be added here that *intensive area assessments* themselves provide models of good practice and can influence assessment and management in comparable areas. For instance, there is no reason why a programme such as the Cornish chapels project, which spells out methodology and selection criteria in great detail, should not offer a model for a similar programme in, say, West Yorkshire, where the concentration of chapels is much the same. If the models are adequate, all the project stages could be handled by a competent local authority and consultants and involve EH only at the final stage to confirm or reject candidates for listing.

Over time, benchmarking projects of this sort could prove a very cost-effective way forward.

C Management agreement approach

5.3.14 Heritage management agreements are central to HPR and the discussion above regarding *intensive area assessments* addresses the issue sufficiently for present purposes. Clearly not all designation programmes will be amenable to this approach but a very large number will be and it is here that effective project management will be at a premium. It is not part of our remit to address the issue of project management in any detail. EH has improved enormously in this regard over the last ten years or so, not least within the departments most closely involved in designation programmes. But there may be a strong case for reviewing project management training and facilitation skills, particularly in the context of complex projects that require cross-disciplinary skills and teams. Accessible brief summaries explaining how successful projects were delivered

(Apethorpe, HELP) would be valuable. We have argued throughout this report that project documentation should give adequate attention to process as well as to data collection and interpretation.

D Character assessment

5.3.15 Area assessment is a debated issue in the context of HPR. It is a foundation stone of current approaches in enabling the spatial analysis that shows what is distinctive and what matters about the historic character of an area. At the same time it moves the discussion into territory where EH has a limited, albeit essential role alongside local planning authorities. Area assessment for designation sits within the characterisation approach and practical models continue to be developed to show how the relationship can foster good planning and local management outcomes, including designation. There are two areas, however, where EH has a specific role:

Designation of areas of national historic importance

5.3.16 The parks and gardens register and the battlefields register (which we were not asked to review) provide a valuable model for protecting other outstanding historic landscapes such as defence areas that have both a special character and specific function. Some work has been done on defence areas, but the idea of creating a register was never taken forward, partly for legal reasons. HPR attaches a high priority to heritage management agreements and it may be that in many cases areas of national historic importance can be managed adequately with no further layer of registration being added. Catchment areas managed and owned by utility companies may be a case in point, but where ownership is mixed or where the importance of the asset lies in the general landscape rather than specific designated assets, then registration has merits.

Guidance for area appraisal

5.3.17 The same considerations apply here as with disseminating benchmarks and guidelines discussed above. EH has already published guidance for area assessment and followed it up with some exemplary studies (e.g., Menuge, *Ordinary Landscapes* and other titles in the *Informed Conservation* series). Where there is a demonstrable need for such published models, then EH can justify producing them, but the ‘demonstrable need’ has to be very robustly defined. More generic guidance has and could continue to be produced to guide local authorities on conservation area assessment. The forthcoming suburbs project might be a useful vehicle for such work.

Public consultation.

5.3.18 It is worth adding a word here about the impact of public consultation on the thematic programmes. As we have already pointed out, there has always been a strong element of partnership and liaison built into the MPP –strong enough to establish an expectation in some quarters that MPP would be resumed, an expectation that needs to be carefully managed if supporters of EH’s designation work are not to be disillusioned or even lost. Partnership were important in some of the early thematic listing work –with local authorities and specialist groups, as with MPP- but the scale of engagement changed dramatically when an obligation to consult with owners, and an exhortation to consult more widely, was introduced in the mid-1990s. This became a serious drain on the small TLR staff, despite excellent support from Public Affairs, and was a major reason why a number of projects did not proceed beyond the assessment stage.

5.3.19 The increased emphasis now placed on public engagement, the need to justify the specialist position, and the expectation that local and non-professional values will also be taken into account, have added a complexity to the assessment/designation process as well as a greater demand on resources. There are lessons to be learnt from the legacy projects, especially the post-war programme, HELP and (although out of scope of this audit) the significant South Acton project (which dealt primarily with the local and specialist significance of assets that were not amenable to national designation). These lessons are to build in and realistically cost the consultation element (which was usually underestimated) and, when necessary, call in (and budget for) professional public relations advice to ensure that the full consultation tool kit is being used to best effect.

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Table 1

MONUMENTS PROTECTION PROGRAMME – PROGRESS from 1995 to 2004 indicating number of designations to 2008

		STEP 1 (characteri- sation)	CORPCE (public consul- tation)	STEP 2 (short- listing)	STEP 3 (site evaluation)	CORPCE	STEP 4 (policy decisions)	STEPS 5 & 6 2004 (implement- ation)	List entries	SAMs
	LIST OF INDUSTRIES								new designations since 1995	
	EXTRACTIVE									
	LEAD	DONE	DONE	DONE	251	DONE	133 sams 56 list	UNDERWAY	1	110
	COAL	DONE	DONE	DONE	304	DONE	70 sams 41 list	UNDERWAY	16	53
	ALUM	DONE	DONE	DONE	25	DONE	12 sams	UNDERWAY	-	9
	TIN, COPPER & OTHER NON-FERROUS METALS Pt 1 : SW England	DONE	DONE	DONE	411	DONE	176 sams 28 list	UNDERWAY	2	28
	TIN, COPPER & OTHER NON-FERROUS METALS Pt 2 : rest of England	DONE	DONE	DONE	137	DONE	40 sams 8 list	UNDERWAY	-	9
	IRON MINING & IRON / STEEL PRODUCTION	DONE	DONE	DONE	467	DONE	213 sams 16 list	-	-	-
	STONE QUARRYING	DONE	DONE	DONE	309	DONE	?132	-		
	SALT	DONE	DONE							
	CLAY	DONE	DONE							
	UNDERGROUND EXTRACTION FEATURES									
	PEAT PRODUCTION									

	Step process:	STEP 1 (characterisation)	CORPCE (public consultation)	STEP 2 (short-listing)	STEP 3 (site assessment)	CORPCE	STEP 4 (policy decisions)	STEPS 5 & 6 2004 (implementation)	List entries	SAMs
	LIST OF INDUSTRIES								new designations since 1995	
	MANUFACTURING									
	GUNPOWDER	DONE	DONE	DONE	51	DONE	12 sams 18 list	DONE	10	11
	BRASS	DONE	DONE	DONE	28	DONE	8 sams 11 list	UNDERWAY	7	1
	GLASS	DONE	DONE	DONE	135	DONE	36 sams 8 list	UNDERWAY	5	11
	LIME & CEMENT	DONE	DONE	DONE	266	DONE	110 sams 7 list	UNDERWAY	14	51
	IRON FORGES & FACTORIES	DONE								
	CHEMICALS	DONE	DONE							
	TEXTILES									
	ENGINEERING									
	METAL WORKING									
	CONSTRUCTION									

	AGRICULTURAL PROCESSING									
	DOVE FARMING	DONE	-	DONE	2059	-	118 sams	UNDERWAY	40	88
	ICE HOUSES	DONE	-	DONE	1579	-	60 sams	UNDERWAY	31	34
	TIMBER									
	CORN DRYING & MILLING									
	BREWING & DISTILLING									
	OTHER ORGANIC AGRICULTURAL PRODUCTS									
	FOOD MANUFACTURE									

	Step process:	STEP 1	CORPCE	STEP 2	STEP 3	CORPCE	STEP 4	STEPS 5 & 6	List entries	SAMs
	LIST OF INDUSTRIES	(characterisation)	(public consultation)	(short-listing)	(site evaluation)		(policy decisions)	(implementation)	new designations since 1995	
	POWER & UTILITIES									
	ELECTRICITY	DONE	DONE	DONE	166	DONE	14 sams 47 list	UNDERWAY	31	2
	WATER & SEWAGE	DONE	DONE	DONE	424	DONE	63 sams 104 list	UNDERWAY	99	9
	GAS & OIL	DONE	DONE	DONE	DONE					
	COMMUNICATIONS									
	MOTIVE POWER :-									
	HUMAN/ANIMAL POWER									
	WATER POWER									
	WIND POWER									
	COMBUSTION ENGINES									

	Step process:	STEP 1	CORPCE	STEP 2	STEP 3	CORPCE	STEP 4	STEPS 5 & 6	List entries	SAMs
	LIST OF INDUSTRIES	(characterisation)	(public consultation)	(short-listing)	(site evaluation)		(policy decisions)	(implementation)	new designations since 1995	
	TRANSPORT									
	BRIDGES	DONE								
	ROADS									
	INLAND WATERWAYS									
	RAILWAYS									
	AIR TRANSPORT									
	SEA & COASTAL									

	MILITARY	Number of sites identified from documentation/ survey	Number sites surviving complete / partial state	Proposed schedulings	MPPA action (<i>implement- ation</i>)	List entries	SAMs
						<i>new designations</i>	
	ANTI-AIRCRAFT GUNSITES (OPERATION DIVER)	3188	301	163 sams	UNDERWAY	2	43
	ANTI-INVASION DEFENCES		c20,000	1487 sams	UNDERWAY	5	76
	BOMBING DECOYS	602 sites (839 decoys)	189 decoys	63 sams (92 decoys)	UNDERWAY		15
	D-DAY EMBARKATION SITES	c100	68	24 sams (13 sites)	UNDERWAY	?	?
	COAST ARTILLERY 1900-1956	286 sites (301 batteries)	164 (58 already designated)	131 (43 new sams)	UNDERWAY	6	15
	WWII AIRFIELD DEFENCES	c740 airfields	?	85 (450 items)	UNDERWAY	11	12
	WWII RADAR STATIONS	200 sites (242 installations)	122	49 (65 items)	UNDERWAY	2	12